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Emergency Operations Plan

Executive Summary

This entire Emergency Operations Plan (EOP), and Annexes, is a joint EOP submitted by Santa Rita Wind Energy LLC for the wind and solar entities listed in Table 1 (referred to as "Projects" in the EOP) in Section 1. The EOP details the actions and responsibilities associated with responding to emergency events that impact the operations of the applicable entity. Table 2 lists the personnel that are responsible for maintaining and implementing this EOP for each entity as well as the individuals that can change this EOP.

The EOP identifies Project site contacts (Section 3: Emergency Contacts pages 3-4)

The EOP addresses the following required components:

- Approval and Implementation (Section: 1 page 2)
    - Applicable Entities (page 2)
    - Responsible personnel (page 2)
    - Revision Control Summary (page 2)
- Distribution Record (Section: 3 page 3)
- Common Operational Functions
    - Emergency Operations Plan (Section: 4 pages 5-13)
    - Weather-Related Emergency Response Plans (Section: 5 pages 13-21)
- Communication Plan (Section: 6 pages 21-22)
    - Media Communications (page 21)
- Pre-Identified Supplies (Section: 7 page 23)
- Staffing Contingency Plan (Section: 8 pages 23-26)
- Annexes (Section: 10 pages 27-39)
    - Weather Emergency (pages 27-28)
    - Pandemic (pages 31-33)
    - Water Shortage (page 33)
    - Restoration of Service (page 34)
    - Hurricane (page 34)
    - Cybersecurity (page 34-37)
    - Physical Security Incident (pages 37-39)

As of April 5, 2022, Revision 0 of this Emergency Operations Plan is the current version and supersedes all previous EOPs. This revision 0 was approved on April 5, 2022 by all the Projects.

1. DISTRIBUTION RECORD

Distribution List

Title	Name	Date Distributed	Distribution method
Wind Site Manager	Tony Graham	4/5/2022	Email and Shared corporate drive
Compliance Program Director	Eric White	4/5/2022	Electronic Copy
Wind Site Manager	Mark Grotjan	4/5/2022	Email and Shared corporate drive
Wind Site Manager	Chris Bearden	4/5/2022	Email and Shared corporate drive
Solar Site Manager	Dan Schmill	4/5/2022	Email and Shared corporate drive
Operations	GenDesk Operators	4/5/2022	Electronic Copy
VP Wind and Gas Operations	Eric Bowen	4/5/2022	Email and Shared corporate drive
VP Solar and Geothermal Operations	Bryan Whitcomb	4/5/2022	Email and Shared corporate drive
Resource Manager	Chance Grady	4/5/2022	Email and Shared corporate drive
Resource Manager	Jack Lee	4/5/2022	Email and Shared corporate drive
Resource Manager	John Wittkop	4/5/2022	Email and Shared corporate drive
Resource Manager	Ryan Bowles	4/5/2022	Email and Shared corporate drive
Resource Manager	Alan Barger	4/5/2022	Email and Shared corporate drive
Market Operations Manager	Jacob Moore	4/5/2022	Email and Shared corporate drive
VP Market Operations	Steve Rowley	4/5/2022	Email and Shared corporate drive

While drills of this EOP have not yet been conducted, each joint Project will complete a drill of this EOP by the end of 2022.

2. Affidavit

As officers with binding authority for the applicable Projects, we, Eric Bowen and Bryan Whitcomb affirm the following:

- We are the Vice President, Operations, for the applicable Projects, and we have authority to execute this affidavit in our capacity as Vice President for each Project.
- That the relevant operating personnel are familiar with and have received training on the applicable contents and execution of this EOP, and such

personnel are instructed to follow the applicable portions of this EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.

- That this EOP has been reviewed and approved by the appropriate executives.
- A business continuity plan that addresses returning to normal operations after disruptions caused by an incident is maintained.
- The Entities' management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.
- As noted above, a drill testing this EOP will be accomplished later in 2022.

Name: Eric Bowen

Title: VP Operations

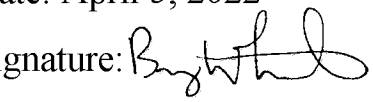
Date: April 5, 2022

Signature: 

Name: Bryan Whitcomb

Title: VP Operations

Date: April 5, 2022

Signature: 

Emergency Operations Plan

Table of Contents

1. APPROVAL AND IMPLEMENTATION

1.1 INTRODUCTION

This Emergency Operations Plan (EOP) details the actions and responsibilities associated with responding to emergency events that impact the operations of the applicable entity. This document is a joint EOP for the wind and solar entities listed in Table 1 (referred to as "Projects" in this document). Table 2 lists the personnel that are responsible for maintaining and implementing this EOP for each entity as well as the individuals that can change this EOP.

Santa Rita Wind Energy LLC has been designated as the filing entity by each of the applicable Projects (listed in Table 1), which are affiliates of Santa Rita Wind Energy LLC, solely for the purpose of filing this EOP. The applicable Projects acknowledge and agree that Santa Rita Wind Energy LLC will be submitting this EOP on their behalf. All Projects reviewed this EOP prior to filing by Santa Rita Wind Energy LLC, and are familiar with this EOP, and each acknowledges its obligation to review and update this EOP.

1.2 APPLICABILITY

Entity	Type	Location	Site Manager
TX Jumbo Road Wind, LLC	Wind	Hereford, TX	Tony Graham
Santa Rita Wind Energy LLC	Wind	Big Lake, TX	Chris Bearden
Flat Top Wind I, LLC	Wind	Mullin, TX	Mark Grotjan
Fluvanna Wind Energy 2 LLC	Wind	Fluvanna, TX	Mark Grotjan
Mariah del Norte, LLC	Wind	Friona, TX	Tony Graham
Alamo 6, LLC	Solar	Fort Stockton, TX	Dan Schmill
BHE Pearl Solar, LLC	Solar	Fort Stockton, TX	Dan Schmill

Table 1: Applicable Entities ("Projects")

1.3 APPROVAL

The following are authorized to approve issues of this document:

Entity	Title	Name	Responsibility
TX Jumbo Road Wind, LLC	Wind Site Manager	Tony Graham	Maintain and Implement
Santa Rita Wind Energy LLC	Wind Site Manager	Chris Bearden	Maintain and Implement
Flat Top Wind I, LLC	Wind Site Manager	Mark Grotjan	Maintain and Implement
Fluvanna Wind Energy 2 LLC	Wind Site Manager	Mark Grotjan	Maintain and Implement
Mariah del Norte, LLC	Wind Site Manager		
Alamo 6, LLC	Solar Site Manager	Dan Schmill	Maintain and Implement
BHE Pearl Solar, LLC	Solar Site Manager	Dan Schmill	Maintain and Implement
All	Compliance Program Director	Eric White	Change EOP
All Wind	VP Operations Wind	Eric Bowen	Change/Approve EOP
All Solar	VP Operations Solar	Bryan Whitcomb	Change/Approve EOP

Table 2: Individual Responsibility Matrix

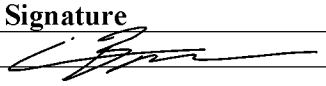
Revision	Description	Name	Signature	Date
0	Initial Implementation	Eric Bowen		04/05/2022

Table 3: Revision and Control

As of April 5, 2022, Revision 0 of this Emergency Operations Plan is the current version and supersedes all previous EOPs. This revision 0 was approved on April 5, 2022 by all the Projects.

2. DISTRIBUTION RECORD

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VP Wind and Gas Operations	Eric Bowen	04/05/2022	Email and Shared corporate drive
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Resource Manager	Chance Grady	04/05/2022	Email and Shared corporate drive
Resource Manager	Jack Lee	04/05/2022	Email and Shared corporate drive
Resource Manager	John Wittkop	04/05/2022	Email and Shared corporate drive
Resource Manager	Ryan Bowles	04/05/2022	Email and Shared corporate drive
Resource Manager	Alan Barger	04/05/2022	Email and Shared corporate drive
Market Operations Manager	Jacob Moore	04/05/2022	Email and Shared corporate drive
VP Market Operations	Steve Rowley	04/05/2022	Email and Shared corporate drive

3. EMERGENCY CONTACTS

3.1 Project Site Contact Lists

Project	Role	Name	Phone	Email
TX Jumbo Road Wind, LLC	Wind Site Manager, Primary Point of contact	Anthony Graham	(O) 806-391-5125 (M) 806-240-1833	Anthony.graham@bherenewables.com
Santa Rita Wind Energy LLC	Wind Site Manager, Primary Point of contact	Christopher Bearden	(O) 325-884-7986 (M) 325-660-6612	Christopher.bearden@bherenewables.com
Flat Top Wind I, LLC	Wind Site Manager, Primary Point of contact	Mark Grotjan	(O) 432-263-9001 (M) 432-557-5293	Mark.grotjan@calenergy.com
Fluvanna Wind Energy 2 LLC	Wind Site Manager, Primary Point of contact	Mark Grotjan	(O) 432-263-9001 (M) 432-557-5293	Mark.grotjan@calenergy.com
Mariah del Norte, LLC	Wind Site Manager, Primary Point of contact	Anthony Graham	(O) 806-391-5125 (M) 806-240-1833	Anthony.graham@bherenewables.com

Alamo 6, LLC	Solar Site Manager, Primary Point of contact	Daniel Schmill	(O) 432-214-8301 (M) 432-290-5425	Daniel.schmill@bherenewables.com
BHE Pearl Solar, LLC	Solar Site Manager, Primary Point of contact	Daniel Schmill	(O) 432-214-8301 (M) 432-290-5425	Daniel.schmill@bherenewables.com

3.2 Corporate Support-Contact List

Alicia Knapp President & CEO BHE Renewables Office – (515)-242-3951 Cell – (515)-777-8354 e-mail: Alicia.knapp@bherenewables.com	Maria Fedorchenko Manager Insurance Office – (702) 402-1595 Cell – (702) 290-2346 e-mail: mfedorchenko@nvenergy.com
Bob Garman VP General Counsel Office - (515) 281-2354 e-mail: Robert.Garman@bherenewables.com	Damian Vallas Procurement GM Office – (515) 242-3086 Cell – (515) 720-2999 e-mail: DMVallas@midamerican.com
Joshua Fenceroy Safety and Training Director Office – (515) 252-6521 e-mail: Joshua.fenceroy@bherenewables.com	Burt Short Manager Human Resources & Admin Services Human Resources/IT Coordinator Office – (760) 348 – 4235 Cell – (760) 604-3820 e-mail: burt.short@calenergy.com
Tom Cross VP and Chief Financial Officer Accounting Office – (515) 253-4953 Cell – (515) 229-7359 e-mail: Thomas.Cross@BHERenewables.com	Mid American IT Support 515-242-4357
Eric Bowen VP Wind and Gas Operations Office – (515) 281-2603 Cell – (515) 201-3680 Email: eric.bowen@bherenewables.com	Bryan Whitcomb VP Geothermal and Solar Operations Office – (760) 348-4004 Cell – (661) 221-8304 Email: bryan.whitcomb@bherenewables.com
Jennifer Cavanagh VP Human Resources Office – 515-281-2456 Cell: 515-281-2456 Email: JLCavanagh@bherenewables.com	Eric White Compliance Program Director Office – (515) 281-2676 Eric.white@bherenewables.com

4. EMERGENCY OPERATIONS PLAN

4.1 INTRODUCTION

This Plan is designed to provide response guidance, minimize disruption to the critical activities at the Projects in the event of a declared major emergency or event affecting plant operations, and enhance the protection of lives and property through effective uses of resources. While this guide does not cover every conceivable situation, it does supply the basic administrative and operational guidelines necessary to cope with most emergencies.

Whenever an emergency affecting the Projects' interests reaches proportions that cannot be handled by routine measures, the Wind/Solar Site Manager, or his designee may declare a state of emergency and these contingency guidelines may be implemented, including previsions noted in BHE Renewables (BHER) Business Continuity Plan (management copies only).

"**Emergency**" is defined as an event that disrupts critical business processes and degrades their service levels to a point where the resulting financial and operational impact to our business becomes unacceptable. These business processes include lives, property, environmental processes and equipment.

This Plan documents the team structure and the actions to be taken by plant personnel in the event of disruption to normal business as a result of a major event or emergency, affecting operations of the Jumbo Road facility or its employees.

Projects' policies and procedures herein will be followed by all employees whose responsibilities and authority cover operational procedures. Projects' emergency operations will be conducted within the framework of these guidelines. Any exception to these procedures will be conducted by, or with the approval of the Compliance Program Director or the VP of Operations. All requests for procedural changes, suggestions, or recommendations will be submitted in writing to the Compliance Program Director and applicable VP Operations for review.

The Projects' Emergency Operations Plan shall be the primary source for guiding employees when confronting emergency situations and supersedes any previously developed and/or implemented policy and procedures, which reference specific emergency situations that had been in effect.

4.2 PRE-EMERGENCY PLANNING/COORDINATION WITH OUTSIDE PARTIES

The Projects have opted to not designate a fire brigade or HAZMAT team and will only train people to the extent necessary to respond defensively to emergencies. As such, Projects will rely on outside entities for response to applicable incidents. The Projects have notified their applicable Fire Departments of their response capabilities and options.

ADMINISTRATION AND IMPLEMENTATION

The Wind/Solar Site Manager will be the **Emergency Coordinator** during the initial Facility response to the incident. This person is responsible for classifying the incident as an internal emergency or as an emergency that could affect people outside the facility boundary. This person shall also be responsible for determining whether assistance from off-site Emergency Response agencies should be requested. The Projects classify emergencies in three main levels:

Incident: emergency that can be controlled by Project personnel with no external aid such as, small spills or small fires.

Level 1: Event that can be controlled by Project personnel with off-site assistance. The Fire Department and/or Law Enforcement.

Level 2: Event controlled by off-site emergency response parties. Full evacuation is required at this level. Entities such as the Fire Department, HAZMAT response units, state troopers, county sheriff, and hospitals could be involved in this emergency level.

Emergency Response agency personnel who arrive on site to provide assistance will report to and provide assistance to the Wind/Solar Site Manager. The Wind/Solar Site Manager will remain in charge until:

The Wind/Solar Site Manager is relieved by VP Operations; or

The emergency response is off site.

4.3 PURPOSE

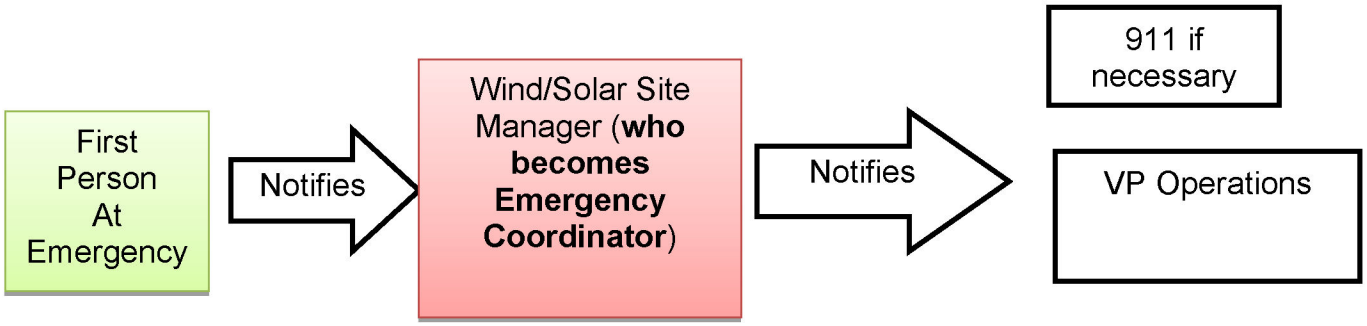
To be effective in handling emergencies, the Projects are committed to establish and implement the following programs:

- Identify potential emergency risks;
- Develop appropriate plans and procedures;
- Assign responsibilities;
- Provide resources and equipment;
- Establish procedures for activation;
- Provide emergency response agencies with relevant information;
- Guide and coordinate emergency communications
- Conduct training and drills;
- Audit and review programs regularly.

Every employee is expected to read, understand and follow the emergency procedures set forth in this plan. Since an emergency may be sudden and without warning, these procedures are designed to be flexible in order to accommodate contingencies of various types and magnitude.

4.4 EMERGENCY NOTIFICATION PROCEDURE

Every Project employee is responsible to report any incident that may threaten operations, the health, safety and welfare of employees and other personnel on site.



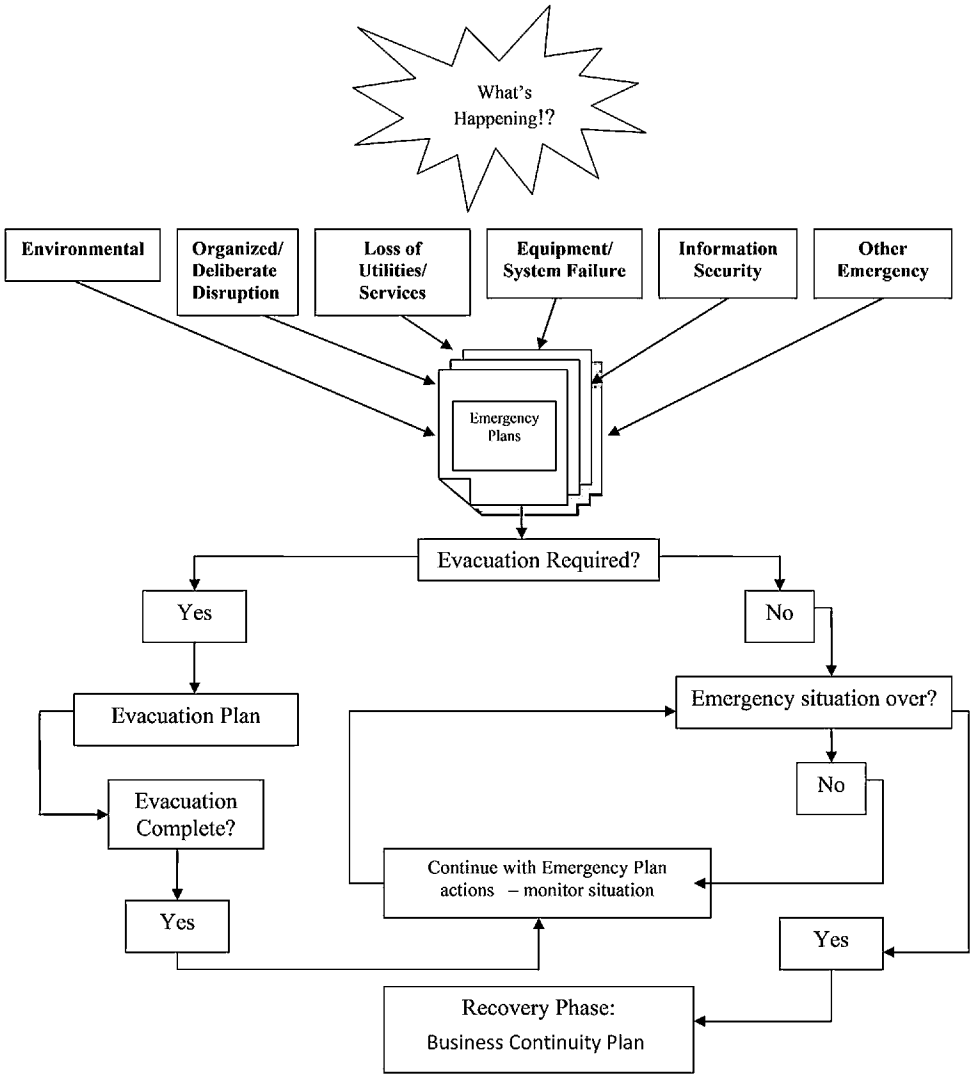
Upon notification of an emergency situation, the Wind/Solar Site Manager shall act as **Emergency Coordinator.**

The **Emergency Coordinator** shall immediately assess the situation and categorize the emergency as follows:

- Fire
- Earthquake
- Severe weather (storms, flooding, etc.)
- Environmental damage (spill or release)
- Bomb threat
- Intruder alert
- 'Other' emergency (theft, sabotage, compliance, cyber, refinery event, etc.)

Conduct emergency actions as appropriate.

4.5 DECISION LOGIC DIAGRAM – EMERGENCY ACTIONS



4.6 CHAIN OF COMMAND

In light of site-specific requirements, multiple coordination responsibilities may be tasked a single individual. Such tasking will be primarily based upon the number of employees available, and inherent site-specific knowledge that may be based upon the longevity of an individual's employment.

For the most part, plant personnel will assume coordinating positions and will be responsible for supplying information as appropriate to each team member.

4.7 RESPONSIBILITIES

Personnel at all levels will be knowledgeable about the Emergency Operations Plan and related procedures as it applies to the whole concept and member specific requirements.

Wind/Solar Site Managers will appoint at least one substitute, provide a point of contact, list of responsibilities, and ensure the individual is available and capable to carry out assigned responsibilities. A Wind/Solar Site Manager may arbitrarily appoint local subordinate "Leaders" if available or required to provide assist and support preparation and implementation of duties. During an emergency event, all members will individually initiate and maintain a date and time activity log of events and situations that occur during implementation. (Who, what, where, when, why and how.)

On-Site Support Team

Wind/Solar Site Manager –

The Wind/Solar Site Manager shall review the available information and circumstances of the incident in determining whether to declare the incident as an 'emergency' necessitating initiation of this Plan and BHER Business Continuity Plan.

The ultimate decision to declare an emergency and implement this Emergency Operations Plan resides with the VP Operations or his designee, who initiates a communication to the Chief Executive Officer indicating that the crisis management team is being activated. Only summary information will be available until the full scope of the incident can be determined. It will include:

- Nature and scope of the incident or event
- Issues related to life-safety, environmental, customer or stakeholder impacts and responses initiated
- Contact information for the incident command center
- Immediate resource needs requiring CEO attention
- Proposed time and frequency of status updates
- Subsequent status updates:
- Provide updated status of incident or event
- Describe action plan being implemented
- Identify resource requests that require CEO approval or assistance

Upon identification of an incident the Wind/Solar Site Manager shall contact the relevant team members, and where necessary mobilize them to the proximity of the affected site to conduct an initial assessment of the nature and extent of the incident.

It is anticipated that the initial assessment and report (see appendix) for "Initial Incident Report") on the incident will be verbal via mobile phone with the VP of Operations providing, in summary, the following details as available:

- Nature and magnitude of incident;
- Anticipated casualties;
- Emergency and other authorities in attendance;

At all times company representatives will comply with instructions and guidance provided by the Emergency Services and other authorities. Personal safety, and the safety of others, is paramount and exposure to unnecessary risk shall be avoided.

During the plan execution phase, the Wind/Solar Site Manager coordinates the plan execution activities and provides critical communication link between the local Emergency Response Team and other business continuity teams.

The Wind/Solar Site Manager will organize and direct damage assessment and business recovery efforts.

Damage assessment will include timely, appropriate and adequate records of the incident. The scale and nature of the incident will inevitably influence the nature and detail of the information to be collected. The scope may be supplemented under guidance from the insurers, or their agent. However, such information is anticipated to include but not be limited to:

- Photographic records and evident
- Costs of contingency and recovery activities – direct and indirect
- Schedules of items lost
- Statements from witnesses
- Schedules of salvaged items

The philosophy is to collect as much relevant information as possible rather than be prematurely restrictive or selective. Surplus or duplicate information will be filtered later.

The Wind/Solar Site Manager will coordinate with environmental, compliance and information technology corporate contacts to address applicable corrective action/reporting needs.

4.8 COMMAND CENTERS

The Command Center is the primary command and control location for emergency recovery activities. Command Center may be established in response to a potential threat/event or in response to the occurrence of a disastrous event.

The Command Center will provide a nucleus and staging point for both internal and external emergency services. It should be equipped with appropriate manpower and equipment to support all functions of the Crisis Management Team. Such equipment includes:

Communication equipment;

Emergency plans and procedures;

A log to record all actions taken during the crisis;

Necessary office equipment and supplies;

Appropriate maps and building plans.

In a "major emergency" isolated to a single area the Command Center will be located at the Operations and Maintenance Building.

In a "major emergency" affecting the entire site area disrupting overall operations, the Command Center may be located off-site.

4.9 FIRE PREVENTION

Fire prevention measures are a critical part of the emergency operations plan, as such smoking is prohibited in all areas. Proper housekeeping and storage measures are to be maintained at all times.

The following is a list of the major workplace fire hazards and their proper handling and storage procedures, potential ignition sources and their control procedures, and the type of fire protection equipment or systems in place to control a fire involving them.

A list indicating the location of fire extinguishers throughout the facility is located in Table 4. The location of all water supply hydrants and monitors, fire hose cabinets, fire hoses, and foam carts are also listed in the Table 5.

O&M Building

The O&M building workplace hazards include assortments of containers ranging from aerosol cans to 55-gallon drums of used oil storage. Potential ignition sources include welding operations, heating and general maintenance. These materials are not stored near any heating source, lighting apparatus or equipment capable of igniting these combustible materials. All heating and potential ignition sources will be controlled in the event of a fire or flammable liquid spill inside the maintenance shop. The employees in this work area will perform control actions.

Portable fire extinguisher locations noted in Table 4.

Site	Building Room	Location
TX Jumbo Road Wind, LLC	Office	Hallway, kitchen, shop
	Substation / JUSS	Two located in Substation control house, two located in the JUSS control house
Santa Rita Wind Energy LLC	Office Side	In Main Entrance; Kitchen; East Hall
	Warehouse Side	By Exits on West, North and East
Flat Top Wind I, LLC	O&M building office area	1 extinguisher by front door on North wall, 1 extinguisher in South hallway by tech room
	O&M building shop area	1 extinguisher on East wall, 1 extinguisher on North wall and 1 extinguisher on Southwest wall

	Substation	2 extinguishers by front door, 1 extinguisher by back door
Fluvanna Wind Energy 2 LLC	O&M building	Hallway next to main door
	Warehouse office area	1 extinguisher in kitchen area
	Substation	1 extinguisher by front door and one extinguisher by back door
Mariah del Norte, LLC	Office	Office area, shop
	Substation	Located inside the control house
Alamo 6, LLC	Office	Hallway, shop, warehouse
	Substation	Alamo 6 Substation- dual extinguishers
BHE Pearl Solar, LLC	Substation	Pearl Substation- dual extinguishers

Table 4: Fire Extinguisher Locations

Substations

The major hazard would be from electrical fires. De-energization is the sole means of fire control for this location.

Wind Turbine Generators

Wind turbine generators exhibit some combustible materials (primarily in the nacelle) as well as the oil transformers located in switchgear outside the turbine. Fire Extinguishers will be used as the first line of fire defense.

Solar Inverters

Solar Project generator consist of the DC solar panel arrays and the Inverters (Power Conversion Station). The major hazard would be from electrical fires. Deenergization is the sole means of fire control for these locations.

4.10 FACILITY EMERGENCY EQUIPMENT

INTERNAL COMMUNICATIONS AND ALARMS

Emergencies are reported to the Wind/Solar Site Manager via telephone and two-way radios.

EXTERNAL COMMUNICATIONS

Telephones are located in the O&M Buildings.

PORTABLE FIRE EXTINGUISHERS

Fire extinguishers are located at various points within the O&M building (See Table 4). Operator technicians carry a portable fire extinguisher in their work trucks.

WATER AVAILABILITY

Fire hydrants, monitors, fire hose cabinets and firehouses are located at various points throughout the plant. Locations are listed in the Table 5.

Site	Water Source	Location	Connection Type
TX Jumbo Road Wind, LLC	Non-potable Water	Faucet on side of O&M Building	Normal water faucet
Santa Rita Wind Energy LLC	Non-potable Water	Faucet on side of O&M Building	Normal water faucet
Flat Top Wind I, LLC	Non-potable Water	Faucet on side of O&M Building	Normal water faucet
Fluvanna Wind Energy 2 LLC	Non-potable Water	Faucet on side of O&M Building	Normal water faucet
Mariah del Norte, LLC	Non-potable Water	Faucet on side of O&M Building	Normal water faucet
Alamo 6, LLC	Well	O&M building	Hose connection to water tank
BHE Pearl Solar, LLC	none		

Table 5: Water Source Locations

Trained personnel will handle incipient fires. Area workers who have been trained in the use of fire extinguishers may assist in the handling of incipient fires. Fire Department will respond to a major fire.

Portable fire extinguishers are designed for this purpose, but their successful use depends on the following conditions:

The extinguisher must be properly located and in good working condition.
The extinguisher must be properly rated for the Class of fire.
The fire must be discovered while still small enough for the extinguisher to be effective.
The fire must be discovered by a person ready, willing, and able to use the extinguisher.

****NOTE:** All portable fire extinguishers are rated to fight Class "A", "B", and "C" fires.

5. EMERGENCY RESPONSE

For this plan to function properly, all response personnel must have an understanding of the general details of the incident. As soon as practical, the Wind/Solar Site Manager should gather all relevant facts, assess the situation and develop a plan of action. The Wind/Solar Site Manager should consider existing conditions, estimate future probabilities, review the details of the incident, and evaluate the level of response necessary to mitigate the incident. This evaluation should be weighed against the response capability of the facility. The following items should be considered when assessing the emergency:

- Time of emergency
- Location of the emergency

- Nature of the emergency
- Duration of the emergency
- Personnel exposures
- Equipment involved; collapse; exposure
- Root cause of the emergency
- Fire
- Weather conditions
- Potential hazard to life
- Additional assistance required / available
- Notification requirements, including those to off site and / or regulatory agencies

LOCAL GOVERNMENT RESPONSE

In order to provide the most efficient response to emergencies, all response and recovery activities must be coordinated through a central location or organization. The local Emergency Response Agencies will activate the Incident Command System, (approved by the National Fire Academy), if response to an emergency requires more than one agency to become involved.

For a complete discussion of the authorities, responsibilities, capabilities, and assignments of these Emergency Response agencies, please refer to the applicable Local and State Emergency Operation Plans.

If at any time, an emergency requires a response the facility and local agencies are unable to provide, the state may be asked to provide additional support to the response effort. If the response requires more than the state can provide, the Federal Emergency Management Agency may be approached to request federal aid be made available.

Several local organizations may also be available to provide support to an emergency response effort. These include voluntary organizations, religious organizations and business organizations. The resources of the Projects are listed in this Plan under "Contacts".

Project	**Primary shelter in place location**	**Backup shelter in place location**
TX Jumbo Road Wind, LLC	Men's bathroom	N/A
Santa Rita Wind Energy LLC	Library room in O&M Building	N/A
Flat Top Wind I, LLC	Underground storm shelter on NW side of O&M building	Men's restroom in O&M building
Fluvanna Wind Energy 2 LLC	Men's restroom in warehouse building	Men's restroom in O&M building
Mariah del Norte, LLC	Outside behind the shop in ground shelter	N/A
Alamo 6, LLC	Bathroom	Substation
BHE Pearl Solar, LLC	Alamo 6, LLC Bathroom	Substation

Table 6: Shelter Locations

5.1 EVACUATION

In the event of an emergency requiring a plant evacuation, the following procedure will be followed. Things to consider; wind direction, location, exposure risk, assembly location, who should leave, and timing.

- Activation of EOP

A. WIND/SOLAR SITE MANAGER

❖ Announces evacuation order for the affected area and / or buildings. All on site personnel will report immediately to the O&M building for instructions.

Note: Every employee shall evacuate the facility in the safest route possible if at any time they feel their lives are threatened or in jeopardy. However, it is critical that all employees be accounted for, so you should be sure the Wind/Solar Site Manager or whomever is doing a head count knows your whereabouts.

❖ Will designate who remains on site if the emergency situation allows.

❖ Will provide VP Operations with pertinent information necessary to make a decision regarding continued operations.

❖ Will determine accountability of all visitors, contractors, and vendors, (Use Visitor Log).

B. PLANT PERSONNEL

❖ Once the evacuation order is given, plant personnel will leave by the safest route determined in an orderly fashion.

❖ Follow Wind/Solar Site Manager instructions.

5.2 TORNADO

- Identification

Wind/Solar Site Manager's rely on local news broadcasts, National weather emergency alert notifications (via cellphone) to identify possible tornado events.

- Activation of EOP

In the event of extreme weather, Project personnel should immediately move to a safe place and **immediately** notify the Wind/Solar Site Manager of the exact nature of the event. It will be up to the exposed individual to ascertain the situation during the initial stages of the emergency and take immediate precautions to remain safe.

A. PLANT PERSONNEL

- ❖ Will report immediately to the Wind/Solar Site Manager, unless otherwise specified during the initial announcement, or if in doing so they are exposing themselves to potential injury.

- ❖ Will go about task assigned by Wind/Solar Site Manager

- ❖ If an evacuation order is given, plant personnel will leave, by what is determined to be the safest route, in an orderly fashion in accordance with plant evacuation procedures.

- ❖ If sheltering in-place is required, plant personnel will move to the closest building with interior walls and remain until safe to exit. Projects have identified the locations listed in Table 6 as the best sites for sheltering in place if required and depending upon your location at the time of the event.

B. Wind/Solar Site Manager

- ❖ Upon identification of imminent Tornado event Wind/Solar Site Manager will:
  - o Ensure shelter locations are prepared and remind personnel of locations.
  - o Communicate Shelter-In Place directive as applicable
  - o Safely secure plant equipment as required.
  - o Notify VP operations of major tornado issues.

- ❖ Will notify the local 911 District if situation warrants outside assistance by Emergency Response Personnel.
  - o Determine site evacuation needs

- ❖ Upon end of Tornado event:
  - o Contact VP Operations to activate Business Continuity Plan as needed

5.3 HURRICANE

- Identification

Wind/Solar Site Managers rely on local news broadcasts, National weather emergency alert notifications and Weather Sentry forecasting alerts (via cellphone) to identify possible hurricane, or inland hurricane, events.

- Activation of EOP

A. PLANT PERSONNEL

- ❖ Will report immediately to the Wind/Solar Site Manager, unless otherwise specified during the initial announcement, or if in doing so they are exposing themselves to potential injury.

- ❖ Will go about task assigned by Wind/Solar Site Manager

- ❖ If an evacuation order is given, plant personnel will leave, by what is determined to be the safest route, in an orderly fashion in accordance with plant evacuation procedures.

- ❖ If sheltering in-place is required, plant personnel will move to the closest building with interior walls and remain until safe to exit. Projects have identified the locations listed in Table 6 as the best sites for sheltering in place if required and depending upon your location at the time of the event.

B. Wind/Solar Site Manager

- ❖ Upon identification of imminent Hurricane event Wind/Solar Site Manager will:

  - o Call out extra manpower as deemed necessary.
  - o Ensure protective safety measures have been implemented to prevent injury to employees (de-icier applied, proper clothing, frequent breaks, fluid consumption, etc).
  - o Safely secure plant equipment as required.
  - o Communicate Shelter-In Place directive as applicable
  - o Notify VP operations of major hurricane issues.
  - o Notify the local 911 District if situation warrants outside assistance by Emergency Response Personnel.
  - o Determine site evacuation needs

- ❖ Upon end of Hurricane event:
  - o Contact VP Operations to activate Business Continuity Plan as needed

5.4 EXTREME COLD WEATHER

- Identification

Wind/Solar Site Manager's rely on local news broadcasts, National weather forecasts to identify possible extreme cold weather events. Wind/Solar Site Managers also receive Weather Sentry forecasting alerts (via cellphone) to identify possible extreme weather events.

- Activation of EOP

A. PLANT PERSONNEL

- ❖ Will report immediately to the Wind/Solar Site Manager, unless otherwise specified during the initial announcement, or if in doing so they are exposing themselves to potential injury.

- ❖ Will go about task assigned by Wind/Solar Site Manager

- ❖ If an evacuation order is given, plant personnel will leave, by what is determined to be the safest route, in an orderly fashion in accordance with plant evacuation procedures.

- ❖ If sheltering in-place is required, plant personnel will move to the closest building with interior walls and remain until safe to exit. Projects have identified the locations listed in Table 6 as the best sites for sheltering in place if required and depending upon your location at the time of the event.

B. Wind/Solar Site Manager

- ❖ Upon identification of imminent Extreme Cold Weather event Wind/Solar Site Manager will:

  - o Communicate to all site personnel imminent Extreme Cold Weather event
  - o Call out extra manpower as deemed necessary.
  - o Ensure protective safety measures have been implemented to prevent injury to employees (de-icier applied, proper clothing, frequent breaks, fluid consumption, etc).
  - o Safely secure plant equipment as required.
  - o Notify VP operations of major freeze issues.

- ❖ Upon end of Extreme Cold Weather event:
  - o Contact VP Operations to activate Business Continuity Plan as needed

5.5 EXTREME HOT WEATHER

- Identification
  Wind/Solar Site Manager's rely on local news broadcasts, National weather forecasts to identify possible extreme hot weather events. Wind/Solar Site Managers also receive Weather Sentry forecasting alerts (via cellphone) to identify possible extreme weather events.

- Activation of EOP

A. PLANT PERSONNEL

- ❖ Will report immediately to the Wind/Solar Site Manager, unless otherwise specified during the initial announcement, or if in doing so they are exposing themselves to potential injury.

- ❖ Will go about task assigned by Wind/Solar Site Manager

- ❖ If an evacuation order is given, plant personnel will leave, by what is determined to be the safest route, in an orderly fashion in accordance with plant evacuation procedures.

- ❖ If sheltering in-place is required, plant personnel will move to the closest building with interior walls and remain until safe to exit. Projects have identified the locations listed in Table 6 as the best sites for sheltering in place if required and depending upon your location at the time of the event.

B. Wind/Solar Site Manager

- ❖ Upon identification of imminent Extreme Hot Weather event Wind/Solar Site Manager will:

  - o Ensure implementation of **Plant Weatherization Plan**
  - o Call out extra manpower as deemed necessary.
  - o Ensure protective safety measures have been implemented to prevent injury to employees (proper clothing, frequent breaks, fluid consumption, etc).
  - o Safely secure plant equipment as required.
  - o Notify VP operations of hot weather issues.

- ❖ Upon end of Extreme Hot Weather event:
  - o Contact VP Operations to activate Business Continuity Plan as needed

5.6 DROUGHT

- Identification

Wind/Solar Site Manager's rely on local news broadcasts, National weather forecasts to identify possible drought events. Wind/Solar Site Managers also receive Weather Sentry forecasting alerts (via cellphone) to identify possible drought events.

- Activation of EOP

A. PLANT PERSONNEL

- ❖ Will report immediately to the Wind/Solar Site Manager, unless otherwise specified during the initial announcement, or if in doing so they are exposing themselves to potential injury.

- ❖ Will go about task assigned by Wind/Solar Site Manager

- ❖ If an evacuation order is given, plant personnel will leave, by what is determined to be the safest route, in an orderly fashion in accordance with plant evacuation procedures.

- ❖ If sheltering in-place is required, plant personnel will move to the closest building with interior walls and remain until safe to exit. Projects have identified the locations listed in Table 6 as the best sites for sheltering in place if required and depending upon your location at the time of the event.

B. Wind/Solar Site Manager

❖ Upon identification of imminent Flooding event Wind/Solar Site Manager will

- Verify/increase stockpiles of additional water supplies
- Implement water use restrictions to preserve available water
- Ensure protective safety measures have been implemented to prevent injury to employees (proper clothing, frequent breaks, fluid consumption, etc).
- Safely secure plant equipment as required.
    - Notify VP operations of major flooding issues.

❖ Upon end of Drought event:

- Contact VP Operations to activate Business Continuity Plan as needed

5.7 FLOODING

- Identification

Wind/Solar Site Manager's rely on local news broadcasts, National weather forecasts to identify possible flooding events. Wind/Solar Site Managers also receive Weather Sentry forecasting alerts (via cellphone) to identify possible flooding events.

- Activation of EOP

A. PLANT PERSONNEL

❖ Will report immediately to the Wind/Solar Site Manager, unless otherwise specified during the initial announcement, or if in doing so they are exposing themselves to potential injury.

❖ Will go about task assigned by Wind/Solar Site Manager

❖ If an evacuation order is given, plant personnel will leave, by what is determined to be the safest route, in an orderly fashion in accordance with plant evacuation procedures.

❖ If sheltering in-place is required, plant personnel will move to the closest building with interior walls and remain until safe to exit. Projects have identified the locations listed in Table 6 as the best sites for sheltering in place if required and depending upon your location at the time of the event.

B. Wind/Solar Site Manager

❖ Upon identification of imminent Flooding event Wind/Solar Site Manager will

- Call out extra manpower as deemed necessary.

- Ensure protective safety measures have been implemented to prevent injury to employees (proper clothing, frequent breaks, fluid consumption, etc).

- Prepare flooding precautions, to include sandbag detail around O&M Building and generators as needed

- Safely secure plant equipment as required.

    - Notify VP operations of major flooding issues.

❖ Upon end of Flooding event:
- Contact VP Operations to activate Business Continuity Plan as needed

6. COMMUNICATION PLAN

EMERGENCY MEDIA COMMUNICATIONS PROCEDURES

Objective: To maximize the use of our company resources in responding to emergencies involving our company and the public.

Plan Purpose: To provide timely, accurate and professional external and internal communications in a manner consistent with our corporate interests.

Premises:

1. Company emergencies are such events as fires, explosions, electric contact, or natural weather- related situations that involve company non-utility or utility service, equipment, property or employees and other similar situations that may attract "on the scene" interest from local, regional, or even national news media.

2. During initial stages of any emergency involving company personnel or facilities, our operations managers should be free to respond to the emergency and not be distracted by the news media. Managers should be available, as time permits, to respond to the media on a prearranged schedule.

3. BHER corporate communications personnel will be able to focus their efforts on responding to news media inquiries and, working with appropriate division management, balance the need and obligation for protecting the company interest with the need to inform the public and our employees.

Emergency Activation Steps

Step 1: Generation facilities or management (or alternate), at earliest indication of a possible emergency, will contact corporate communications as per the attached call list.

Step 2: BHER corporate communications coordinates with management to initiate the following as appropriate:

- Establish communications between management and corporate communications by identifying telephone, cellular, or email to maintain contact

- Designate a media relations contact person and direct him/her to the scene. (Timeliness is important!)
- BHER corporate communications contacts the incident management coordinator (see call list) to advise appropriate incident management team leaders of the situation (management notifications)
- Local management directs employees on the scene of the emergency to refer media inquiries to the media relations contact person on the scene

Step 3: As rapidly as possible, the designated media relations contact person and management will determine what essential facts may be shared with the news media and employees. This will be reviewed with the legal department. A spokesperson will be selected.

Step 4: After the initial emergency response is under control, working as a team, management, and designated media relations contact person will determine what media statements will be made (if any), who will make them, and the time and place. This may or may not require a formal news briefing.

CORPORATE COMMUNICATIONS CALL LIST

<u>During Normal Office Hours</u>

- Media Hotline - 515-281-2211
- Paulette Rush, Community Relations Manager – 661-221-2676
  Jessica Strawn, Director Corporate Communications – 515-281-2711

<u>Outside of Normal Office Hours</u>

- Media Hotline - 515-281-2211
- Paulette Rush, Community Relations Manager – 661-221-2676
  Jessica Strawn, Director Corporate Communications – 515-281-2711

EXTERNAL REGULATORY COMMUNICATION PROCEDURES

Prior to communicating with external regulatory authorities, including the Public Utilities Commission, local and state governmental entities, Wind/Solar Site managers shall coordinate with Compliance Program Director, VP Operations wind/solar and Berkshire Hathaway Energy legal department. Communications with these entities will occur after emergency actions have been taken to address the emergency situation.

Communications with applicable emergency operations centers, Transmission Operators, Reliability Coordinators will be accomplished by the Wind/Solar Site Manager and include status updates of the availability of the entity during the emergency situation. These communications shall be accomplished as soon as practicable while addressing the emergency situation.

7. PRE-IDENTIFIED SUPPLIES FOR EMERGENCY RESPONSE

The Projects have on-site spare inventories for most components that may be required, including some critical spares with business recovery plans. Spares inventory information is shared among platforms through the site risk management plans in order to enhance availability in the event of an emergency. Out-of-area vendors used by other Berkshire Hathaway Energy locations will be utilized in the event of an unavailability of local supply. The Projects maintain relationships with other operating facilities having similar generating equipment, which may also be a potential source of prime mover hardware parts.

8. STAFFING CONTINGENCY PLAN

Even though it is not possible to plan completely against every hazard that poses a staffing risk, preparedness measures for the above areas help reduce the impact of these events if we take certain actions before an event occurs. As such, the Projects have planned for staffing continuity to safeguard the interests of our business and our employees in an emergency event.

This plan is primarily for the guidance of full-time employees, temporary employees, and managers while carrying out the Project's ongoing operations during an emergency event that has the potential to disrupt facility operations. An emergency event has the potential to create a difficult and unnatural work environment, which places an increased burden on all employees who are able to report for work as normal. This Plan sets forth some of the policies and procedures that will govern our employees. Staffing contingency details are set forth in this Plan.

8.1 Staffing Contingency Policy

It is the Project's intent to maintain service to its customers to the fullest extent possible given the resources at hand. Success in operating during an emergency event is dependent upon the availability of employees and the full cooperation of all employees who continue to report for work in performing assigned tasks.

8.2 Assumptions

A. Safety and Compliance – The Projects place the safety of its employees and contractor personnel above any other consideration. During emergencies, field personnel work long hours and in many instances under unusual conditions which introduce hazards for the employee. All personnel should be alert to the increased accident potential of emergency work and take extraordinary measures to guard against accidents -- job planning should be emphasized. Safe procedures should be consistently practiced. The importance of working safely should be repeatedly stressed. Particular attention should be given the general welfare and morale of all personnel. The Wind/Solar Site Manager or his designee will be the primary contact for safety and compliance related issues.

B. Timing and Duration – Emergency events can occur at any time with little or no warning. Therefore, it is critical that staffing plans be updated on a regular basis and

kept readily available. The impact of such an event is indeterminate due to multiple variables that will not be identical during an event.

C. Personnel - Operations activities during an emergency event would be conducted by contract personnel, management, available hourly personnel and other company personnel at remote locations not impacted.

8.3 Event Experience

A. Successful operation during an emergency event will require a nucleus of experienced plant employees with the necessary knowledge and skills to perform normal work activities. The Plan also anticipates that qualified resources will be provided through staffing from third-party contractors and qualified personnel from throughout the Company. Such people qualified to lead and train others in this work can be found in managerial or supervisory positions in like operations within the company.

B. Special security measures, under the guidance of the Wind/Solar Site Manager, may be necessary during an event to properly control access to the facilities. Planning should include careful assessment of the locations where uniformed security guards will be needed. Prior arrangements must be made with a qualified agency to provide security guards when needed.

C. Proper training and testing to ensure replacement personnel have the necessary qualifications to complete the required tasks associated with their job duties during an event are essential. Wind/Solar Site Managers will work jointly with Environmental Services, Corporate Safety and other available employees to complete the necessary training and testing prior to any employee being released to perform a job task.

D. It is important to keep all employees well informed on staffing plans, employee availability, problems being encountered in the operation, and resolutions. Successful operations are dependent upon thorough communication regarding any issue both on and off the job.

8.4 Responsibilities for Detailed Plans and Execution

8.4.1 General

A. Continued operations are dependent upon available qualified staffing, a thorough analysis, and development of contingency plans to address the emergency conditions.

B. Available plant personnel will be assigned to duties where their qualifications are best utilized. Vacations or leaves of absence of persons required for plant operations will be cancelled or rescheduled.

C. Work schedules will be developed to meet the Projects' needs. Where possible every effort will be made to allow at least one day in seven away from work for each employee.

8.4.2 Operations Coordination

A. The Wind/Solar Site Manager or his designee will supervise development and execution of the Plan including:

- Determine the need and timing of a commitment to procure special materials, services and issue instructions to execute the Plan.
- Direct the organization to make timely preparations for manpower to fill the needs of the operation. Authorize commitments for qualified contractors, qualified work leaders and the identification of available personnel.

B. When the likelihood of a disastrous event is apparent, the Wind/Solar Site Manager will alert key support personnel to make all timely preparations and will authorize commitments for materials, supplies, and special services required for continued operations.

C. Each department (see Corporate contacts) will assist with the coordination of needed activities under the direction of the Wind/Solar Site Manager.

8.4.3 Manpower Requirements

A. The Wind/Solar Site Manager will oversee and coordinate all plan activities including the development of a manning table to assure qualified people are available to meet all anticipated needs. Work schedules should provide for a minimum of one day in seven away from work for each employee if possible.

B. The Wind/Solar Site Manager will be responsible for maintaining continued plant operations with all available manpower resources from qualified contractors, plant employees, and other company employees who will perform the required operations tasks. Wind/Solar Site Manager will coordinate training on site specific equipment.

C. The VP/Chief Accounting Officer will provide necessary accounting support to ensure all accounting/financial requirements are maintained.

D. The Manager of Environmental Services will provide the support necessary to ensure environmental compliance is continually maintained.

E. Human Resources will develop and maintain a list of employees who may be utilized for operations duties where their qualifications are best utilized to provide continued plant operations. Where personnel with special skills from outside the work group are required, Human Resources will assist with locating these individuals and arranging for on-site assistance.

F. Purchasing support will be provided by Procurement located in Urbandale, IA.

8.4.4 Materials, Supplies and Services

A. The Wind/Solar Site Manager shall review the status of critical equipment, stocks of regularly used materials and supplies, and their availability on short notice. Based on this review, appropriate restocking of items shall be initiated where lack of supply would be critical.

B. The Wind/Solar Site Manager will review all maintenance needs and activities to determine staffing needs and work schedules.

8.4.5 Employees

A. The Company places the safety of its personnel above any other consideration. In circumstances of an emergency event, personnel may be required to work long hours, and in many instances, in circumstances that are unfamiliar to them. All personnel must be alert to the increased accident potential in these circumstances and take extraordinary measures to prevent accidents. Carefully planned, safe-working procedures must be consistently used. Special training will be provided in safe work methods and procedures. Particular attention should be given to the general welfare and morale of all personnel.

B. Operator Qualification: All employees and contractors must use qualified employees for covered tasks. The successful execution of the Plan will largely be dependent upon the available resources with the required qualifications. Non-covered tasks may be performed by employees and/or contractors with the requisite knowledge and skills.

To the extent possible any contract work should be awarded well in advance of a work interruption.

Review the status of critical equipment, stocks of regularly used materials and supplies, and their availability on short notice. Start material procurement far enough in advance to ensure adequate supplies

List of special materials, supplies, and services that will need to be acquired and on hand during an event. This list should be in sufficient detail to verify its availability and lead time for delivery.

9. PLAN TESTING/MAINTENANCE

Projects will update this plan on an annual basis and will conduct annual drills to ensure proper plan functionality. Drill methods:

- Tabletop reviews
- Section testing
- Simulations
- Phone checks
- Plan drills

Reviews will be conducted by Wind/Solar Site Manager.

10. ANNEXES

10.1 Annex A: Weather Emergency

This plan is designed to prepare the facility and its employees in advance of extreme weather conditions which may impact plant operations such as those experienced during the peak winter and summer months.

10.1.1 EXTREME COLD WEATHER

Wind/Solar Site Manager

- Direct site personnel to verify functionality/implementation of Weather Weatherization Winter checklist
- Verify control house HVAC heaters are working and filters are changed regularly
- Verify control house auto transfer switch is capable of operating in the event of a primary line outage
- Verify main power transformer oil level including conservator and LTC conservator sufficient, if applicable
- Verify main power transformer control cabinet heaters are operational
- Verify control house battery chargers are operational
- Apply ice melt at substation walkways and ensure sufficient ice melt available for turbine/inverter locations as applicable.
- Adjust substation temperature to 70 degrees Fahrenheit
- Review procedure with techs for approaching a turbine after potential icing event
- Verify wind turbine anemometer heater is operating properly as applicable
- Verify nacelle and hub heaters are operating properly (including but not limited to: nacelle space, yaw drive, pitch motor, gearbox, slip ring, and control cabinet)
- Verify all cold weather insulation is still properly installed
- Verify wind turbine low ambient temperature parameter is set correctly for the model (standard, cold weather, or cold weather extreme) of turbine as applicable
- Verify turbine/inverter cabinet doors close and seal correctly to prevent ice or snow from getting in.
- Verify turbine/inverter door filters are installed correctly and there is no gap for snow to blow in.
- Verify Propane tanks for the backup generators are full, as applicable
- Review lessons learned from previous weather emergencies with personnel
- Verify additional supplies needed to accommodate Cold Weather event
- Determine whether site personnel should evacuate site location.
  - Prior to evacuation, notify Qualified Scheduling Entity and generation desk of the evacuation

10.1.2 EXTREME HOT WEATHER

Wind/Solar Site Manager

- Direct site personnel to verify functionality/implementation of Weather Weatherization Summer checklist
- Verify control house auto transfer switch is capable of operating in the event of a primary line outage
- Verify main power transformer oil level including conservator and LTC conservator sufficient, if applicable
- Verify control house battery chargers are operational
- Verify turbine/inverter door filters are installed correctly and there is no gap for snow to blow in.
- Verify Propane tanks for the backup generators are full, as applicable
- Review lessons learned from previous weather emergencies with personnel
- Verify additional supplies needed to accommodate Hot Weather event
- Determine whether site personnel should evacuate site location.
  - Prior to evacuation, notify Qualified Scheduling Entity and generation desk of the evacuation

10.2 Annex B: STANDARD PROCEDURES FOR SPILLS/LEAKS

Standard emergency response procedures have been developed for major potential hazards at the Project facilities. Major chemical hazards include equipment oil sources and propane fuel all of which are stored in above ground storage tanks, (ASTs) or the actual equipment.

Project personnel can respond defensively to an incident or release. This means they can control a release but cannot act aggressively to stop a release. Under OSHA regulations a higher level of training is necessary to respond aggressively.

In the event of an AST rupture, Project personnel must notify the appropriate Fire Department for an aggressive response to stop the release. Once the release has been stopped, Project's response personnel can take remedial action to clean/contain the spill area.

SPILL/ENVIRONMENTAL INCIDENT RESPONSE PROCEDURE

EMPLOYEE WHO IDENTIFIES A SPILL

The employee must inform the Wind/Solar Site Manager by two-radio or telephone, noting whether material is contained or has escaped containment.

Wind/Solar Site Manager

- Obtains the following information from employee:

  - Name and location.
  - What the problem is.
  - Release contained, or containment breached.

- Estimate of amount released.
- Anyone injured or contaminated.
- Determine if employee is in a safe location, if not advise employee to move to another location and call back.
- Advises employee help is on the way.

❖ Notify VP Operations and Director of Environmental Compliance and give information on event.

❖ Announce spill incident and location. Repeats announcement a minimum of two times.

❖ Notifies other Project employees.

❖ Secure the area to prevent accidental entry (barricade tape, cones, etc.)

❖ Take action to stop or minimize the spill. Utilize spill containment kits.

❖ Contacts the applicable Fire Department if instructed by VP Operations or if outside assistance is deemed necessary by Wind/Solar Site Manager.

❖ Guide emergency response agencies as required.

Note: When contacting local Emergency Services, (911), give the dispatcher the following information:

YOUR NAME
Phone Number
Project Name
Project location and directional information

- Date, time, location of spill
- Specific description of substance spilled; have Safety Data Sheet (SDS) available when you call.
- Estimated quantity of spill.
- Duration of spill (start and stop times if possible).
- Name of surface water threatened by spill.
- Source of spill.
- Description of actual or potential water pollution or harmful impacts to the environment.
- Actions already taken, are being taken, and will be taken to contain and respond to the release/spill.
- Any known or anticipated health risks.
- Name of Organizations/Agencies already contacted.
- Any other information that may be significant to the response action.

In addition to the above-mentioned list, the Texas Commission of Environmental Quality (TCEQ) and others contacted might need some additional information not anticipated by this plan. The person reporting the spill should answer (to the best of his/her ability) any questions asked by the agency being reported to.

MAINTENANCE PERSONNEL

- Will report to the Wind/Solar Site Manager or spill area if directed by Wind/Solar Site Manager for assistance as needed.
- Assist as directed (spill kit, gather PPE, escort emergency services, etc.)

MANAGEMENT

- Will assume Emergency Coordinator responsibilities upon arrival.
- Determine need for additional resources.
- Conduct external reporting in accordance with agency requirements (work with Director of Environmental Compliance).
- Coordinate clean up responsibilities as necessary.
- Conduct Internal reporting requirements as required (see below).

MITIGATION PLAN

- Always evaluate spills regardless of size and question what your response would be if spill were larger.
- Monitor weather conditions via internet and weather radio (what if water comes into contact with spill or leak, what if wind direction changes, etc.).
- Be aware of additional hazards in the area (energized equipment, chemicals, etc.).
- Get additional help as required.
- Communications with Wind/Solar Site Manager are critical.
- Escort emergency response personnel to proper location.
- Always don proper PPE.
- Consult with SDS on proper handling, hazards and clean-up response.
- Do not issue safe work permits for job task that put personnel at risk or near the vicinity of the spill.
- Properly secured adjacent areas from risk (close overhead doors, barricades, etc.).

10.3 ANNEX C: RESPONSE TO A PANDEMIC/EPIDEMIC EVENT (Disease, Ebola, etc.)

In the event of a Pandemic Event the below steps will be taken with a primary focus being on health and stopping exposure/spreading. One of the key steps is recognizing that a potential event is present and taking preventive step as defined below to prevent manpower shortages, loss of lives, environmental/safety risk, publicity and morale issues (worry, grief, inattention, family concerns).

AFFECTED EMPLOYEE

- Will immediately notify Wind/Solar Site Manager.
- Should rapidly leave facility seeking nearest hospital, if unable to leave, self-isolate on company property, until medical help arrives.

Wind/Solar Site Manager

- Will notify 911 and determine the best method for seeking medical attention and isolation needs.
- Designate someone to notify Emergency Room or care facility that an employee is in route and may have a contagious disease (get instructions on where to go and what to do upon arrival, etc.).
- Use radio to notify all employees of potential event and with instructions to remain clear of the employee or isolation area (do not have a group meeting).
- Notify VP Operations.
- Lock down control room (no visitors). If visitors are necessary, the Wind/Solar Site Manager can sign them in and have alternate employee meet them in front of building to conduct business.
- Notify off-site employees or contractor who may have potentially been exposed.
- Establish daily conference call with all employees to provide updates.
- Distribute applicable event information to all employees (signs and symptoms, protective measures, treatments).
- Contact local health care agencies to determine if there are active cases within the county.

Additional steps to be taken based on severity, isolation needs and to minimize spreading or potential exposure:

- Staffing
  - Minimize staffing levels (review scheduling needs) to only critical personnel necessary to maintain plant operations
    - Implement customized shift arrangements (split shift and/or segregated work locations)
  - Implement work from home options and corporate job support needs
    - Management team, project analyst, environmental coordinator
  - Suspend in-person contact where possible (maintain 3-feet separation distance)
    - Suspend in-person group meetings
    - Utilize Skype, screen sharing, Zoom, Facetime, etc.
    - Move necessary meeting if necessary, to a larger room where distancing can be maintained
  - Restrict use of common areas (maintain social distancing)
    - Restrict use of lunchrooms to single person only
    - Utilize facility in use signs to avoid accidental occupancy by multiple personnel
  - Eliminate all non-critical site visits (contractors, deliveries, visitors)
    - Only scheduled visitors will be allowed access to Project and only after a discussion on how this will be handled, why it is needed, duration, etc.
    - Visitors will not be allowed to enter control room and will be signed in by control room operator via phone call (no in person discussion)
  - Establish remote delivery locations for high impact vendors (mail, deliveries, etc.).
  - Adjust critical town runs to optimal low pedestrian traffic times (supplies)
    - Purchase supplies in greater quantities to minimize town runs
    - Utilize delivery service utilizing drop off point
    - Determine optimal town run times to avoid high traffic times
  - Suspend all non-critical planned maintenance activities
  - Contact contractors to determine what steps are being taken within their organization to minimize or detect the spreading.

- Isolation Steps
  - Utilize on-line meetings, phones, e-mail, etc. for performance of LOTO, permits, etc. (verbal authorizations and approvals via phone or email)
  - Eliminate travel where possible (travel plans must be approved by management)
    - Consider off peak times, alternative transportation methods, size of meeting, possible variance alternatives
  - Implement mandatory workstation sanitation needs
    - Wipe down workstations at start and end of each shift (computers phones, doorknobs, commonly shared devices
    - Utilize protective barriers (gloves) for commonly shared devices (doorknobs, keypads, locks, cabinets, etc.)
    - Place disinfectant sprays and wipes in immediate vicinity of commonly shared devices
  - No sharing of work tools (pens, water dispenser, clip boards, phones, etc)

- Each person will bag their own trash and dispose of prior to exiting facility.
- Consider early detection methods (temperature, testing methods)

❖ Supplies
- Double per-established minimum inventory levels of infection control supplies (mask, sanitizer, gloves, towels, etc.)
- Maintain adequate supply of bottled water/food (Microwaveable Dishes, canned goods, etc.)
- Ensure adequate supplies are available for on-site showers, bedding, clothes, hygiene products, bedding, etc.
- Secure additional rest room facilities, rental trailers for lodging.
- Determine need to purchase additional plant operating supplies (chemicals, reagents, etc.)

❖ Communications
- Utilize alternative communications tools (Radios, cell phones and computers).

❖ Review and utilize additional External Resource Options
- Accounting- process payables, increase spending limits, reporting
- Human Resources – assist with staffing needs (counseling, time-off, etc.)
- Communications – corporate will assist with external/internal communications
- IT – provide additional laptop computers, wireless cards, etc.

MITIGATION PLAN

❖ Implement additional protective hygiene measures.

❖ Consider additional isolation measures for plant employees.

❖ Monitor alerts and news updates via internet.

❖ Limit access to Project to only essential operating personnel.

❖ Trust your instinct (if something looks suspicious or unsafe it probably is).

❖ Immediately report any signs of illness.

❖ Get additional help as required.

10.4 Annex D: Water Shortage Annex

Not applicable for Wind and Solar projects as these do not utilize water in electricity production.

10.5 Annex E: Restoration of Service Annex

Upon completion of emergency response, Wind/Solar Site Managers will follow the process noted below to restore the project to an operational status.

1. Verify emergency situation has ended
2. Ensure project area is safe and secure and ready to resume operations
    a. Confirm no imminent fire hazards exist
    b. Confirm site equipment is free from damage and ready for operation
    c. Confirm no remaining safety hazards exist
    d. Ensure all personnel are accounted for
3. Contact VP Operations and receive approval to restore operations
4. Contact Transmission Operator and Qualified Scheduling Entity for approval to resume operations
5. Follow-normal energization procedures and associated communications to resume operations

10.6 Annex F: Hurricane Annex

Not applicable to Projects as none exist within hurricane evacuation zones identified by TDEM

10.7 Annex G: Cyber Security Annex

1. Responsibilities

A. Project personnel and contractors shall notify Wind/Solar Site Manager of any actual or suspected Cyber Security Incidents.

B. The Wind/Solar Site Manager shall respond appropriately to Cyber Security Incidents and notify the VP Operations.

C. Wind Site Manager and VP Operations shall coordinate on Cyber Security Incident investigation, classification, reporting, and mitigation.

1. Technical Support and Security personnel shall assist in the investigation, classification, reporting, mitigation, and response to Cyber Security Incidents as requested.

2. Details

A. <u>Immediate Response</u>

Upon Identification of a Cyber Security Incident (or suspected Incident), Project personnel shall immediately report the Incident to the Wind/Solar Site Manager and any other available appropriate Plant Management personnel.

Wind/Solar Site Manager shall contact and coordinate with the VP Operations on the appropriate Cyber Security Incident Reporting and Response.

B. Incident Reporting

Cyber Security Incidents shall be classified and reported (See Attachment 1 for assistance)

E-ISAC Reporting - Threat and Incident Reporting Form

a. Unless prohibited by law, report Incident to E-ISAC for any Incident reported to DOE or NERC, otherwise, complete the Threat and Incident Reporting Form for the following Incidents classifications:
    i. Unauthorized Modification
    ii. Attempted Cyber Intrusion
b. Methods:
    i. E-mail: operations@esisac.com
    ii. Telephone: 404-446-9780

C. Incident Mitigation/Response

Wind/Solar Site Manager and any appropriate designated personnel shall respond to and mitigate Cyber Security Incidents. Considerations shall include:

- Stage of the incident (beginning, in-progress, or previously occurred)
- Potential dangers or safety effects on facility operation or personnel
- Systems and equipment that are or may be affected
- Availability of backup or redundant systems
- The groups that may be affected
- Who should be part of the immediate response (Security, IT, Engineering, Maintenance, etc.)

1. Electronic Security Perimeter (ESP) Breaches
    a. The immediate response should focus on containment of the problem to minimize its effects on equipment and stop the spread to other parts of the system. This may include:
        i. Disabling Connectivity
        ii. Implementing access restrictions
        iii. Removing equipment or programs from service (provided its removal does not itself compromise or disrupt stable operations).
        iv. Requesting technical support as needed (engineering, maintenance, IT) to ensure proper response and for the backup and storage of information required to recover BES Cyber System functionality.
2. Electronic Security Perimeter (ESP) Attacks

    The immediate response should focus on ensuring the ESP is still secure and that the Cyber Attack did not result in an ESP Breach. Responses may include:

i. Reviewing ESP configurations (firewall settings, intrusion detection logs, etc.)
ii. Validation that Cyber Assets have not been compromised
iii. Requesting technical support as needed (engineering, maintenance, IT) to ensure proper response.

3. Threats
   a. Verbal Threats - Obtain all available information regarding the threat so that appropriate notifications and actions may begin.
      i. If a caller is involved, question them and obtain type of threat and any other available details. Keep on the line as long as possible for tracing purposes (if possible).
      ii. Notify the Wind/Solar Site Manager and other appropriate management so that reporting requirements may be considered.
   b. Electronic Security Perimeter (ESP) threats - although uncommon, threats to the ESP should be responded to using the same measures as ESP attacks.
4. Suspected Activities
   a. All suspected activities should be treated as breaches until investigations have been completed. The Wind/Solar Site Manager should be notified of the Suspected Activity. If a suspected ESP breach is determined to be invalid, normal operations should continue. Suspected Activities may include:
      i. Suspicious Activity within or near the Facility
      ii. Unknown devices, equipment, packages within the Facility
      iii. Unknown (abnormal) personnel
      iv. Unexplained equipment malfunctions
      v. Abnormal behavior of Cyber Assets

3. Attachments

A. Attachment 1: Incident Classification and Reporting Guidance

Classification	Report to NERC/E-ISAC When
Cyber Perimeter Compromise – Unauthorized Ingress or egress through the electronic perimeter or into an electronic perimeter device.	Unauthorized electronic access to cyber assets whose impairment could impact the reliability of the bulk power system.
Unauthorized modification – Unauthorized addition or modification of software or data associated with the proper operation of cyber assets.	Malicious software or data modification is discovered on a cyber asset or assets that may impact the reliability of the bulk power system.
Attempted Cyber Intrusion – A detected effort to gain unauthorized ingress or egress through the electronic perimeter or into an electronic perimeter device but without obvious success.	Attempt to gain unauthorized electronic access to cyber assets whose impairment could impact the reliability of the bulk power system.

Expressed Threat – Communicating a threat.	Threatened action has the potential to damage or compromise a facility (including cyber assets) or personnel.
Actual Attack (Cyber or Communication) – Attack via cyber, or communications means.	An actual attack against generation, transmission, or company-owned or operated communication facilities or cyber assets
Attempted Attack (Cyber or Communication) – Attack via cyber or communications means.	A suspected attack against generation, transmission, or company-owned or operated communication facilities or cyber assets

10.8 Annex H: Physical Security Incident Annex

1. Responsibilities

A. Project personnel and contractors shall notify Wind/Solar Site Manager of any actual or suspected Cyber Security Incidents.

B. The Wind/Solar Site Manager shall respond appropriately to Cyber Security Incidents and notify the VP Operations.

C. Wind Site Manager and VP Operations shall coordinate on Cyber Security Incident investigation, classification, reporting, and mitigation.

1. Technical Support and Security personnel shall assist in the investigation, classification, reporting, mitigation, and response to Cyber Security Incidents as requested.

2. Details

D. Immediate Response

Upon Identification of a Physical Security Incident (or suspected Incident), Project personnel shall immediately report the Incident to the Wind/Solar Site Manager and any other available appropriate Plant Management personnel.

In-progress Physical Attack or Intrusion

a. Wind/Solar Site Manager shall formulate an immediate response that may include:

i. Alerting on-site personnel of any existing safety issues. If personnel safety is threatened, personnel may be directed to take refuge or other actions as appropriate.

ii. Determining if additional assistance is immediately needed.

iii. Taking actions to mitigate the immediate risk to reliable operation of the Bulk Electric System.

E. Incident Reporting

Physical Security Incidents shall be classified and reported (See Attachment 1 for assistance)

E-ISAC Reporting - Threat and Incident Reporting Form

c. Unless prohibited by law, report Incident to E-ISAC for any Incident reported to DOE or NERC, otherwise, complete the Threat and Incident Reporting Form for the following Incidents classifications:

iii. Unauthorized Modification
iv. Attempted Cyber Intrusion

d. Methods:
iii. E-mail: operations@esisac.com
iv. Telephone: 404-446-9780

F. Incident Mitigation/Response

Wind/Solar Site Manager and any appropriate designated personnel shall respond to and mitigate Physical Security Incidents. Considerations shall include:

- Stage of the incident (beginning, in-progress, or previously occurred)
- Potential dangers or safety effects on facility operation or personnel
- Systems and equipment that are or may be affected
- Availability of backup or redundant systems
- The groups that may be affected
- Who should be part of the immediate response (Security, IT, Engineering, Maintenance, etc.)

5. Physical Security Perimeter (PSP) Breaches
   a. Physical security breaches should be investigated and the security perimeter secured. If determined to be a malicious act or potentially malicious act, responses may include:
      i. Ensuring the safety of on-site personnel
      ii. Notification of law enforcement (as appropriate)
      iii. Determining whether the attack has caused damage to equipment that could compromise or disrupt reliable operations
6. Physical Security Perimeter (PSP) Attacks

   The immediate response should focus on ensuring the safety of on-site personnel and mitigating the risk to reliable operations by protecting, restoring, or securing equipment or by otherwise stabilizing or securing plant operations.
7. Threats
   b. Verbal Threats - Obtain all available information regarding the threat so that appropriate notifications and actions may begin.
      iii. If a caller is involved, question them and obtain type of threat and any other available details. Keep on the line as long as possible for tracing purposes (if possible).
      iv. Notify the Wind Site Manager and other appropriate management so that reporting requirements may be considered.

c. Physical Security Perimeter (PSP) threats (bombs, sabotage, weaponry, etc.) - Conduct a review of protective measures that are in place to ensure mitigation capability is intact.
    i. Implement increased security measures such as more frequent security patrols or additional security personnel (as appropriate).
    ii. Conduct searches of security perimeters and plant spaces for signs of ingress or attempted ingress and report to the Wind/Solar Site Manager and other appropriate management.
    iii. Once the threat window has passed, consider returning measures and controls to the baseline security posture.

8. Suspected Activities
    b. All suspected activities should be treated as breaches until investigations have been completed. The Wind/Solar Site Manager should be notified of the Suspected Activity. If a suspected PSP breach is determined to be invalid, normal operations should continue. Suspected Activities may include:
        iv. Suspicious Activity within or near the Facility
        v. Unknown devices, equipment, packages within the Facility
        vi. Unknown (abnormal) personnel
        vii. Unexplained equipment malfunctions

3. Attachments

A. Attachment 1: Incident Classification and Reporting Guidance

Classification	Report to NERC/E-ISAC When
Physical Perimeter Compromise – Unauthorized access of a person or a device through, circumventing, or damaging the physical perimeter, or security systems protecting the physical perimeter	Unauthorized access of a person or a device through, circumventing, or damaging the physical perimeter, or security systems protecting the physical perimeter
Unauthorized modification – Unauthorized addition or modification of software or data associated with the proper operation of physical assets.	Malicious software or data modification is discovered on a cyber asset or assets that may impact the reliability of the bulk power system.
Attempted Physical Intrusion – A detected effort to gain unauthorized access of a person or a device through the physical perimeter but without obvious success.	Attempt to gain unauthorized physical access to facilities, systems, or equipment (such as cyber assets) that could impact the reliable operation of the bulk power system is targeted, focused, or repetitive.
Expressed Threat – Communicating a threat.	Threatened action has the potential to damage or compromise a facility (including cyber assets) or personnel.
Weapons Discovery – Discovery of explosives.	Discovery occurs at or near a facility.
Actual Attack (Physical or Communication) – Attack via physical or communications means.	An actual attack against generation, transmission, or company-owned or operated communication facilities, or personnel occurs.
Attempted Attack (Physical or Communication) – Attack via physical or communications means.	A suspected attack against generation, transmission, or company-owned or operated communication facilities or personnel occurs